

Original

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CV 04 4857

Velma Craig

COMPLAINT

NAME OF PLAINTIFF(S)

City of New York

Police Department

School Safety Division

NAME OF DEFENDANT(S)

RECEIVED

NOV 3 2004

PRO SE OFFICE

TOWNES, J.

BLOOM, M.J.

This action is brought for discrimination in employment pursuant to (check only those that apply):

☒

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.

☐

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102-166).

NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.

☐

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117 (amended by the Civil Rights Act of 1991, Pub. L. No. 102-166).

NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.

Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under New York law.

1. Plaintiff resides at:

567 Eastern Parkway
Street Address
Kings Bklyn. 11216 (718) 604 8112
County State Zip Code Telephone Number

2. Defendant(s) resides at, or its business is located at:

110 Livingston Street (Personnel) Div. School Safety
Street Address
County Bklyn. NY 11201
City State Zip Code

3. The address at which I sought employment or was employed by the defendant(s) is:

110 Livingston Street (Division School Safety)
Street Address
County Bklyn. NY 11201
City State Zip Code

4. The discriminatory conduct of which I complain in this action includes (check only those that apply).

☐ Failure to hire.
☐ Termination of my employment.
☐ Failure to promote.
☐ Failure to accommodate my disability.
☒ Unequal terms and conditions of my employment.
☒ Retaliation
☒ Other acts (specify): Defamation of character
Harassment - withholding pay & check ^{union}

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

5. It is my best recollection that the alleged discriminatory acts occurred on:

12/23/03 - February 9, 2004 -
 Date(s) March 1, 2004 April 9, 2004
April 16, 2004

6. I believe that the defendant(s) (check one)

☒ is still committing these acts against me.
☐ is not still committing these acts against me.

7. Defendant(s) discriminated against me based on my:
 (check only those that apply and state the basis for discrimination, for example, what is your religion, if religious discrimination is alleged)

☐ race _____ ☐ color _____
☐ gender/sex _____ ☒ religion _____
☐ national origin _____
☐ age _____ My date of birth is: 6/21/61
 Date
☐ disability _____

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

8. The facts of my case are as follows:

I have received repeated acts of retaliation based
upon my religious conviction Re: The Dept. New ID card,
which I refused because of its possible spiritual significance.
Suspended for 7 weeks without pay-Received a check
for \$177.66 After working 3 weeks, when I questioned this
I was told your name was not put in the computer. Received
constant notifications after restored to duty when I questioned
this A supervisor informed me "They want to make sure you
don't end up suing them." Also the school safety manager who
spread rumors about me, stated he knows I'm not
crazy But they (Attach additional sheets as necessary)
can't believe someone's belief is that
strong." (see attached).

Note: As additional support for your claim, you may attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights, or the New York City Commission on Human Rights.

9. It is my best recollection that I filed a charge with the New York State Division of Human Rights or the New York City Commission on Human Rights regarding defendant's alleged discriminatory conduct on: _____
 Date

10. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: 7/04
 Date

Note EEOC stated they would inform Human rights.

Only litigants alleging age discrimination must answer Question #11.

11. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one),

_____ 60 days or more have elapsed.

_____ less than 60 days have elapsed.

12. The Equal Employment Opportunity Commission (check one):

_____ has not issued a Right to Sue letter.

☒ has issued a Right to Sue letter, which I
received on Approximately Aug 8, 2004.
Date

NOTE: Attach a copy of the Right to Sue Letter from the Equal Employment Opportunity Commission to this complaint.

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs, and attorney's fees.

Yelena Brang
PLAINTIFF'S SIGNATURE

Dated: November 3, 2004

567 Eastern Parkway
Address

Brooklyn, NY 11216

(718) 604 8112
Phone Number

506(212) 645 3300 Ext 3111

EEOC Form 151 (3/98)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Velma Craig**
260 New York Avenue
Brooklyn, NY 11216

From: **New York District Office**
33 Whitehall Street
5th Floor
New York, NY 10004

☐ On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR § 1601.7(e))

EEOC Charge No.

EEOC Representative

Telephone No.

160-2004-02777

Patrick A. Sanford,
Investigator

(212) 336-3677**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans with Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC. In other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
- ☐ Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
- ☐ While reasonable efforts were made to locate you, we were not able to do so.
- ☐ You were given 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
- ☒ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

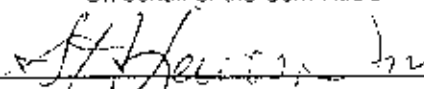
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this Notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


Spencer H. Lewis, JR.,
Director

AUG 05 2004

Enclosure(s)

(Date Mailed)

cc:

NEW YORK POLICE DEPARTMENT
School Safety
Personnel Director
110 Livingston Street
Brooklyn, NY 11201

Synopsis

Re: Velma Craig

This statement and attached affidavit lists the sequence of occurrences Relative to this plea for justice. I believe this case will be handled Seriously and professionally. Please note the affidavit is a synopsis to what actually occurred. I have filed a claim with the Equal Employment Opportunity (See attached Letter from EEOC.)

This begin with the new ID card issued by the NYC Police Dept. Which I have refused, due to my sincere spiritual convictions as a Christian. I do believe I have a right to hold to my religious belief without experiencing unreasonable opposition, which is on the contrary what I have experienced from the Police Dept.

1. Employment Discrimination Re: Religion -- For holding to Religious belief -- As a minister of the gospel was labeled Unjustly.
2. Unjust co-operated Suspension -- Suspended for 7 weeks without pay when suspension is suppose to be 30 days.
3. Repeated Acts of retaliation -- One of which is after 3 weeks of restored duty was given a check for \$177.66, when I questioned this, "I was told your name was not put in the computer.
4. Harrassment -- constant notifications to go here, go there. One of which was from a young lady, at the office I formerly Worked stated "Ms. Craig fax the paper, their waiting" I Asked who is waiting she stated arrogantly everybody." (note: I was no longer working with this office, yet some of these people were present in the borough office during my suspension.)

Also when I asked a supervisor why was I receiving these Notices she answered " They want to make sure you don't End up suing them." This person also stated the first day Of my duty back on job. "I don't know what I would do If I were in your shoes."

Page 2

5. Withholding pay and promised union check with prejudice –

A. After papers were submitted to dept. by me stating I was a victim of employment discrimination. Person who was scheduled to meet with me to give me the Union check, which was said to be more than \$3,000. On the day of our meeting I phoned and was told this person was on their way to florida on a business trip. I received no call or letter from that day in April until now.

B. Re: Pay when I called to question this I was given a Telephone runaround, which ended with the following statement "One person has your check and they won't tell you Who."

I am filing this lawsuit For 7.7 million dollars claiming my legal right for justice as an American Citizen who was violated greatly under Article 1 Re: The Human Rights law and the First Amendment of the Constitution of the United States of America.

I have suffered greatly as a result of this entire ordeal the Loss of employment for 6 months – I was provoked to Leave my desired profession – to work with children and Resign on the grounds of undeserved hardship.

Causing Immeasurable damages, pain and suffering to myself and My 14 year old son.

The landlord made a decision to evict Me from my home during the suspension.

Financial setback making it extremely challenging to catch Up financially, setbacks with shelter, food and clothing. Resulting in personal loans from family members which Caused additional pain and suffering to my personal and Professional reputation.

Synopsis

AFFIDAVIT

I, Velma Craig, My Title was School Safety Agent

Level 1. On December 23, 2003 I was suspended by Mr. Thomas Mezzatesta, School Safety Manager after five years of service without pay. This ordeal began regarding the new I.D. Card which I refused to accept based on my personal religious conviction. As a result I was asked to go for evaluation which I also refused. (See attached A)

I was assigned to P.S. 235. My duties were Sole Safety Agent for three months (14 exits and approximately eleven hundred students). I interacted with students and staff. Visitors were asked to sign in and present photo identification. I worked for five years within the school system. All of my evaluations were satisfactory. On several occasions by staff and supervisors I was informed I was doing a good job. I was also asked to consider a promotion. On February 9, 2004, I was restored to duty in an office environment, however, this was not what I applied for as my chosen profession. I was not informed of any further disciplinary action. This hostile environment which was created for me was extremely challenging. All of the workers were strangers to me yet they seemed to have heard of this ordeal. It became clear to me by whispers, snickers, laughter, unusual introduction, gestures, etc. This hostile environment in time became extremely annoying. Shortly thereafter I began to receive notifications report here, report there.

FILE COPY

I probably received more notifications in my seven weeks of restored duty than my five years in the schools, which I choose to work with children. On March 1, 2004, I received a telephone call from an irate worker probably a school safety agent Level 1, who worked at my former Borough office, Brooklyn South Command where Mr. Mezzatesta was manager. She stated "Ms, Craig sign the paper and fax it back, they are waiting". I asked "who is waiting?" she replied "everybody". (see attached B)

This statement allowed me to see how rumors circulated on my behalf and I was reminded of a statement made by the Union Rep. "they're trying to say you're crazy".

After working for three weeks, I received a pay check for the amount of \$177.66. which turned out to be a check which was withheld from me for two days of work in December, before my suspension. (see attached Pay Check)

When I inquired of this amount I was told "Your name was not put in the computer" by Payroll Unit Supervisor at 110 Livingston Street, Brooklyn, N.Y. therefore, I had to wait until the next pay date which made a total of 12 weeks without pay. Once again I realize how vast this ordeal had become unfortunately at my expense.

Approximately three weeks after I was restored to duty Mr. Mezzetesta, who was transferred from the Brooklyn South Office to 110 Livingston Street, while he was smoking a cigarette, we spoke briefly outside during my lunch break.

FILE COPY

He stated "I wish you had gone for the evaluation" I answered " Sir, you know there's nothing wrong with me" He replied, "I know we just can't believe somebody's belief is that strong".

Nevertheless the notifications continued. I was then asked to meet with Investigations Unit, Mr. Telfer approximately February 26, 2004. Mr. Telfer stated "I just want to see your log book for December 23, 2003". He then asked me to wait in the hallway, where two other ladies were seated. He stated he was waiting for the Union Rep. When the Union Rep. arrived Mr. Gordon, a new Union Rep. not Ms. Cannon who was transferred shortly after writing a letter on my behalf (See Attached C)

Mr. Gordon went inside to see Mr. Telfer, he returned a few minutes later and he pointed to lady no. 1 and asked "what is your name"? she told him, he then pointed to lady No.2, and asked the same question, she told him, he then pointed to me and said "and you" I answered Velma Craig. He then said, "ok you, we'll start with you". We sat approximately 7-8 feet away from the ladies. Mr. Gordon began to make statements concerning the suspension. He asked about Mr. Mezzetesta, and to see log book for December 23, 2003. He then stated he would like for me to talk and have everything recorded on a tape recorder. I noticed he was holding a piece of paper, I asked to see the paper, it said I have a right to contact legal counsel.

FILE COPY

Under the circumstances I chose this option. Nevertheless, he tried to convince me to go through with the meeting, I refused. Mr. Gordan then stated "I will not let you say anything that will hurt you" I stated I would not talk on a tape recorder under the circumstances without referring to the letter I wrote. Mr. Gordon stated "you're just going to hurt yourself and add more stress to yourself."

I was told by Mr. Telfer I have (30) days to seek legal counsel. I spoke with a lawyer who was very helpful in counsel. When I shared the details regarding the suspension, discrimination, harrasment and the obvious retaliation I was experiencing, "he suggested not to speak on a tape recorder or attend any meetings where notes are taken unless a lawyer is present".

Approximately three weeks later a notification came via speaker phone by one of the supervisors, it stated "tell Ms. Craig she is wanted in the Investigations Unit now!" The supervisor asked did I hear it? I answered yes and also others heard. When I arrived at the Investigations Unit minutes later, Mr. Telfer asked "if I had a lawyer?" I replied "I am seeking". This meeting was brief. On March 29, 2004, Ms. Cannon was now present, the former Union Rep. as I arrived for another schedule date via notification to the investigation unit. Once again the subject was the tape recorder, I once again refused the meeting. Mr. Telfer stated "you have one week to get a lawyer or we are going to have the meeting with or without a lawyer or you will be suspended". This statement cut deeply.

I began to realize how wrong and unjust I was being treated and how I was being used as a gopher to build a wall of defense at my expense. This now was taking a toll financially, emotionally, physically and personally. I asked for the rest of the week off, it was granted.

Mr. Sanford mediation as you suggested, is not an option, neither do I want my job back. I am pursuing justice, I have been unlawfully mistreated, my rights has been violated under ARTICLE 7 OF THE CIVIL RIGHTS ACT OF 1964 and the Constitution of the United States of America in accordance with the FIRST AMENDMENT.

I am pursuing justice, the principle, pain, and suffering in this ordeal which is immeasurable. There has been wanton, willful injury done personally and professional to my reputation, which I must add was a good report. This is what Detective Marciano stated " I spoke to some people about you and a lot of people have a lot of respect for you and had nice things to say about you" during our meeting with Rev. Cook. (During another notification)

On April 5, 2004, I resigned effective immediately on the grounds of undeserved hardship. I decided enough is enough. (see Resignation Letter)

This ordeal has caused extreme professional, financial, personal and once again emotional pain and suffering. Seven weeks without pay as a result of a unjust suspension.

FILE COPY

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I have not receive my last pay check, and a union check which I was promised on April 7, 2004, via telephone by Ms. Cannon. She stated the check had "was more than the last statement I received". (see attached (D)).

On April 9, 2004, I submitted exit interview questionnaire (see attached E) The union check I was told by Ms. Cannon, I am entitled to receive. We made arrangements to meet on April 16, 2004. I phoned her office to tell her I am on my way. I was told by a woman Ms. Cannon was on her way to Florida on a business trip.

Regarding the last pay check I received a total telephone run around. Payroll at 110 Livingston Street in Brooklyn stated my pay was at 1 Police Plaza. When I phoned 1 Police Plaza Payroll Unit, they said my check is at 110 Livingston Street.

On May 4, 2004, I spoke to Ms. Ake in payroll at 110 Livingston Street, regarding my last pay check which was questionable, due to a payroll error. I asked her who has my check? she said "it is at 1 Police Plaza", I replied they told me it was at 110 Livingston St. and she said "that's because one person has it and they won't tell you who".

- 7 -

IN MY CONCLUSION:

This has been a tremendous setback and a nightmare in my life. Nonetheless, restoration I know will come but restoration does not always come quickly. I am trying hard to move on with my life and God's will, purpose and plan for me with a smile yet the pain is still very present, the wound still very new. Sir, try to put yourselves in my shoes...what else shall I do? but seek justice in this massive mess.

I am trying to secure employment which has not been possible yet. I am living by faith in Jesus Christ knowing there are brighter days ahead, nevertheless, justice is not only a last resort but is the only resort.

Thank you for your time, consideration, and prompt response concerning this matter.

STATE OF New York
COUNTY OF KINGS

INDIVIDUAL AFFIRMATION

I, Velma Craig, hereby despose and state that I have
fully answered and stated in the enclosed statements the material required and
in question to the best of my knowledge and ability under the penalty of perjury.

Velma Craig

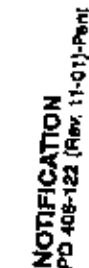
Velma Craig
Respondent

Sworn to before me this 14th
day of July 2004.

Jerry Terry
Notary Public

JERRY TERRY
Notary Public, State of New York
No. 01TE4856072
Qualified in Queens County
Commission Expires March 24, 2006

FILE COPY



NOTIFICATION

PD 408-122 (Rev. 11-01)-Pent

RANK	NAME	SQUAD
SSA1	Velma Craig	1430
APPEAR AT	HOURS, ON THIS	YOU ARE HEREBY NOTIFIED TO
1045	March 3, 2004	Police Plaza
<input type="checkbox"/> %	CRIMINAL COURT PART	<input type="checkbox"/> %
<input type="checkbox"/> %	ADMIN ADJ. BUREAU	<input type="checkbox"/> %
<input type="checkbox"/> %	PARK VTO BUREAU	<input type="checkbox"/> %
<input type="checkbox"/> OUTDOOR RANGE	<input type="checkbox"/> INDOOR RANGE	<input type="checkbox"/> POLICE ACADEMY
<input type="checkbox"/> AREA RQTH	<input type="checkbox"/> CIVILIAN COMPLAINT REVIEW BOARD	<input type="checkbox"/> OTHER
<input checked="" type="checkbox"/> SEE OFF CHARGE HALL 1A		
LOCATED AT	TIME	DATE
Police Plaza	Room 1000	10/14
NOTIFIED BY	SIGNATURE OF MEMBER OF THE SERVICE	
Staff Analyst		
Manzino	1306 3/10/04	
WILL THIS NOTIFICATION RESULT IN THE OFFICER PERFORMING ANY OVERTIME <input type="checkbox"/> NO <input type="checkbox"/> YES EXPLAIN DAY IF OTHER, EXPLAIN		
CALL BACK # 6765 935 3033		

ORIGINAL - M.O.S.

COPY - M.O.S. SIGN AND RETURN TO ROLL CALL

* Sign

Date

Paycheck



THIS CHECK HAS MULTIPLE SECURITY FEATURES TO DETECT FRAUD AND COUNTERFEITING

82-28
3117 6152-09

CHECK DATE JAN 16, 2004	
ITEM NUMBER 005171	CHECK NUMBER B13434957

CHASE MANHATTAN BANK
DELAWARE
1201 MARKET STREET
WILMINGTON, DE 19801

PAY TO THE ORDER OF

PAYROLL FIRM REFERENCE NUMBER
056 1 0193060 VELMA C CRAIG

*ONE HUNDRED SEVENTY-SEVEN DOLLARS 66 CENTS

PAYMENT AMOUNT	
DOLLARS	CENTS
\$ *****177	.66



100% MONEY BACK GUARANTEE
MONTAGUE & SHAW



CITY EMPLOYEES UNION LOCAL 237

AFFILIATED WITH THE
INTERNATIONAL BROTHERHOOD OF TEAMSTERS,
AFL-CIO

216 WEST 14th STREET NEW YORK, N.Y. 10011-7296
January 30, 2004 212-924-2000



CARROLL E. HAYNES
President

RICHARD HENDERSHOT
Vice President

NICHOLAS MANCUSO
Secretary-Treasurer

EUNICE RODRIGUEZ
Recording Secretary

PATRICIA STRYKER
EVARISTO PABON, JR.
GREGORY FLOYD
Trustees

Mr. George Grasso
First Deputy Commissioner
Department of Advocate Office, RA 1412
NYC Police Department
1 Police Plaza
New York, NY 10038

Dear Commissioner Grasso:

I.B.T. Local 237 is writing on behalf of Ms Velma Craig, School Safety Agent, Social Security No. 142-60-2676 who was suspended on Tuesday, December 23, 2003 by Mr. Thomas Mezzatesta, Associate School Safety Manager because of her religious belief. We are requesting for SSA Craig to be restored back to duty.

According to SSA Craig there is a problem with her accepting her new identification card. If you would read her statement hopefully, you will understand why she cannot accept her new ID card.

SSA Craig was called down to the Department of the Advocate's Office to pick up her charges and specification but she was unable to be restored back to duty because of her strong religious belief and ministry. We are requesting an accommodation regarding the new identification, but Ms. Craig had no problem with the old one. If you do investigate, you will find that SSA Craig is a very good Agent with a clean record.

Please see an attached statement and documents as it relates to the above member.

I can be reached at the above telephone number at Ext. 559.

Thank you in advance for your assistance and cooperation.

Sincerely,

Felecia Cannon
Business Agent

TEAMSTERS LOCAL 237
ADDITIONAL SECURITY BENEFIT FUND

216 WEST 14th STREET NEW YORK, N.Y. 10011
212-924-7220

STATEMENT OF ACCOUNT

Board of Trustees

CARROLL HAYNES
Chairman

NICHOLAS MANCUSO
RICHARD HENDERSHOT
JOEL SOSINSKY
GREGORY FLOYD

VELMA CRAIG
260 NEW YORK AVE 3A
BROOKLYN NY 11216

PAUL E. JUERGENSEN
Director

MARK S. WINTNER, ESQ.
Counsel

142-60-2676 CC

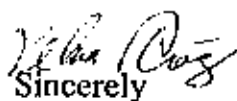
DEPT 5056
TITLE 77777

OPENING BAL	1/01/2003	1,906.66
TOTAL CONTRIBUTIONS		678.00
GAIN/LOSS		375.96
TOTAL PAYMENTS		.00
ENDING BAL	12/31/2003	2,960.62

April 5, 2004

NYPD School Safety Division
110 Livingston Street
Brooklyn, NY 11201
Attn: Robert Reid

This notice is hereby deemed necessary to declare my resignation from the NYPD; on the grounds of underserved hardship effective immediately this 5th day of April 2004.


Sincerely
Velma Craig

Note: This submitted April 9, 2004

(E)

SCHOOL SAFETY AGENT EXIT INTERVIEW QUESTIONNAIRE

Last Name:

Craig

First Name:

Velma

Tax#:

334642

School / SSD Borough Assignment:

Why are you resigning as a School Safety Agent? (If for other employment please give comparative details of wage, benefits, etc.)

Undeserved Hardship.

Re: Religious Issue.

What employment factors (salary, job hours, location, etc.) were most influential in your decision to resign?

Constant Notifications

Threat of Suspension

Defamatory Statements

What non-monetary incentives might have swayed you from your decision to resign? (Eg: work location transfer, work hour flexibility, type of work, etc.)

Ability to work with children

Constant Notifications ceased.

Please list any work advantages and/or disadvantages you encountered during your service as a School Safety Agent?

Great Advantage in working with children and the public.

What recommendations would you make to enhance or improve our School Safety Agent retention efforts?

~~None~~

Only God knows.

Would you recommend the School Safety Agent position to a friend or family member? (If you would or would not please explain why.)

No Comment.

UNITED STATES DISTRICT COURT
For the Eastern District of New York

-----X
In the Matter of the Application

PLAINTIFF NOTICE OF MOTION

VELMA CRAIG

for an order pursuant to Section 3102
CLPR to examine said Defendants in an
action about to be commenced by
Velma Craig

DEFENDANTS NOTICE OF MOTION

CITY OF NEW YORK

-----X
STATE OF NEW YORK)
COUNTY OF KINGS ss:

VELMA CRAIG, being duly sworn, deposes and says:
That I reside in the Borough of Brooklyn, County of
Kings, State of New York.

That I am the Plaintiff in the above claim and is seeking judgment against
said defendants.

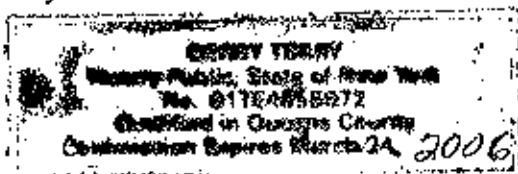
That the statements are true concerning the above defendants to the best
of my knowledge under the penalty of perjury.

Velma Craig
Velma Craig

Sworn to before me this 30th

day of October 2004

Gregory Terry
Notary Public



ORIGINAL